

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

EDGEWOOD HIGH SCHOOL OF THE
SACRED HEART, INC.,

Case No. 3:21-cv-00118-wmc

Plaintiff,

v.

CITY OF MADISON, WISCONSIN, *et al.*,

Defendants.

**PLAINTIFF EDGEWOOD HIGH SCHOOL OF THE SACRED HEART, INC.'S
MOTION TO SUPPLEMENT SUMMARY JUDGMENT RECORD**

Due to the continued public outcry about the project, we have been told by the Director of our department, George Hank, not to issue this permit until further notice.

Alan Harper, City of Madison Building Inspection, March 14, 2019 email (CITY-DEF-052764, produced August 17, 2022)

Plaintiff Edgewood High School of the Sacred Heart, Inc. respectfully moves the Court for leave to supplement the summary judgment record with communications, like the one above, which the City of Madison recently produced. As explained in Edgewood's memorandum in support, the City produced forty-five documents on August 17, 2022 many of which demonstrate the existence of genuine disputes of material fact relevant to Edgewood's opposition to the City's motion for summary judgment filed on May 20, 2022. (Dkt. # 34.) Edgewood respectfully requests leave to supplement the summary judgment record with newly produced documents which support Edgewood's opposition to the City's pending motion for summary judgment.

This motion is supported by Edgewood's Memorandum of Law, Supplemental Responses to Defendants' Proposed Findings of Fact, Supplemental Additional Proposed Findings of Fact,

the Declaration of Jonathan R. Ingrisano, dkt 65, and the September 19, 2022 Declaration of Noel Sterett.

Dated: September 19, 2022

Respectfully submitted,

GODFREY & KAHN, S.C.

s/ Jonathan R. Ingrisano

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